



*Many Voices Working for the Community*

# Oak Ridge Site Specific Advisory Board

---

October 11, 2001

Mr. Rod Nelson  
Assistant Manager for Environmental Management  
DOE - Oak Ridge Operations  
P.O. Box 2001, EM-90  
Oak Ridge, TN 37831

**Comments on DOE/OR/01-1936&D3: Proposed Plan for Interim Remedial Actions for Selected Contaminated Soil, Material, and Blair Quarry within Zone 1, East Tennessee Technology Park, Oak Ridge, Tennessee, June 2001**

Dear Mr. Nelson:

At our October 10, 2001, Board meeting, the members of the Oak Ridge Site Specific Advisory Board (ORSSAB) approved the attached comments.

Overall, we think the Proposed Plan outlines a thoughtful course of remedial action for Zone 1 consistent with the Department of Energy's ongoing development of the ETPP for commercial enterprise, an initiative that the ORSSAB strongly supports.

The numerous environmental and other technical professionals who contributed to this creditable work product are to be commended.

We look forward to receiving your written response to our comments.

Sincerely,

A handwritten signature in black ink that reads "Luther V. Gibson, Jr.".

Luther V. Gibson, Jr.  
Chair

Enclosure

cc: Connie Jones, EPA Region 4  
Pat Halsey, DOE  
Jim Kopotic, DOE  
John Owsley, TDEC  
Donna Perez, DOE  
Myrna Redfield, DOE



## **Oak Ridge Site Specific Advisory Board Comments on DOE/OR/01-1936&D3: Proposed Plan for Interim Remedial Actions for Selected Contaminated Soil, Material, and Blair Quarry within Zone 1, East Tennessee Technology Park, Oak Ridge, Tennessee, June 2001**

---

### **BACKGROUND**

This proposed plan presents the Department of Energy's (DOE's) preferred interim remedial action for selected contaminated soil, material, and Blair Quarry within a portion (Zone 1) of the East Tennessee Technology Park (ETTP.) Formerly known as the Oak Ridge Gaseous Diffusion Plant, ETTP is located on the DOE Oak Ridge Reservation (ORR.) Zone 1, roughly 1400 acres, is the operable unit for this action and is defined as the land area located outside of the main fence of ETTP but within the area where most disposal activities occurred. Furthermore, this proposed plan documents the rationale for selection of the preferred interim remedial actions within the framework of the CERCLA<sup>1</sup>. This document contains information about alternative screening and evaluation beyond what is normally found in operable unit level proposed plan documents.

Originally, the strategy for ETTP included at least two records of decisions (RODs): one for source control and one for groundwater. Upon review of the draft site-wide remedial investigation (RI), the strategy was modified due to concerns about data sufficiency and the magnitude of decision making. Currently, the strategy is to divide ETTP into two discrete zones (or OUs) inside and outside the main fence and to develop a series of RODs (both interim and final) to address identified contamination within each zone. Final RI and feasibility study (FS) documents will be produced to support the final RODs for each zone.

This Proposed Plan is the first time that DOE, EPA Region 4 and the Tennessee Department of Environment and Conservation (TDEC) have tried writing a plan together instead of DOE writing the plan first then sending it to EPA and TDEC for their input and approval.

### **DISCUSSION**

The Board received a presentation on December 13, 2000, on the Zone 1 Proposed Plan and was told that since the Zone 1 activities would be over \$75M the plan must be presented to the EPA Remedy Review Board for consideration. This would cause a delay in the issuance of the plan for about three months. The Environmental Restoration Committee has also had several presentations made to their committee about the progress of the plan. The members also attended the public meeting held September 5.

---

<sup>1</sup> Comprehensive Environmental Response, Compensation, and Liability Act

## COMMENTS

### **General Comment**

These actions represent the first wide-scale implementation of an industrial end use at the ORR. As such, a robust stewardship program incorporating effective institutional controls is an essential component of long-term protection of human health and the environment. The ORSSAB requests ongoing information about this action sufficient to allow us to evaluate the efficacy of the long-term stewardship efforts.

### **Specific Comments**

#### Page 7, 1<sup>st</sup> Column, “ETTP Remediation Strategy” Section

ETTP is a government facility that was used to enrich uranium from 1942 until it was placed in standby in 1985 and permanently shut down in 1987.

#### Page 8, 2<sup>nd</sup> Column, 1<sup>st</sup> full paragraph

Please indicate which contaminants of concern principally contribute to the hazard index.

#### Page 14, 1<sup>st</sup> column, 1<sup>st</sup> full paragraph

Technetium -99 is present in the scrap metal.

#### Page 30, 1<sup>st</sup> column, “Scrap” section, 2<sup>nd</sup> paragraph

The proposed change to DOE Order 5400.5 which will prohibit the recycling of scrap metal containing detectable radiation above background levels, is only one of several alternatives expected to be evaluated during preparation of a programmatic environmental impact statement.